

UNITED STATES SECURITIES AND EXCHANGE COMMISSION NEW YORK REGIONAL OFFICE

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September 22, 2014

BY ECF

The Honorable Denise L. Cote United States District Court for the Southern District of New York 500 Pearl Street, Room 1610 New York, N.Y. 10007

Re: SEC v. Cope et al., No. 14 Civ. 7575 (DLC)

Your Honor:

We write on behalf of the Securities & Exchange Commission ("SEC") in the above-captioned matter in connection with the Order to Show Cause entered by the Court on September 18, 2014 ("OSC"). We have consulted with the defendants and have reached agreement on a proposed modification of the schedule set out in the OSC, and respectfully submit it to the Court for approval on behalf of these parties.

If the below is acceptable, we would ask that the Court "So Order" this letter.

Pursuant to this modification,

- All defendants are to submit any response to the OSC by or before October 7, 2014;
- All defendants who are obligated to do so will submit an accounting pursuant to XV of the OSC on or before October 7;
- The SEC is to submit any Reply in further support of the application on or before October 14, 2014;

The SEC has reached this agreement with respect to defendants Jason Cope, Izak Zirk de Maison (f/k/a Zirk Engelbrecht), Louis Mastromatteo, Angelique de Maison, Kieran Kuhn, Small Cap Resource Corp., Traverse International, Trish Malone, and Ronald Loshin. While the SEC has not been able to obtain confirmation from the corporate defendants Gepco, Ltd., Sunatco Ltd., Suprafin Ltd., and Worldbridge Partners, we are amenable to allowing them the benefit of this extended schedule as well.

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- The hearing, currently scheduled for September 24, will be adjourned to October 22, at 10:00 am, based on our discussions with Your Honor's chambers; and
- The relief ordered in the September 18 Order to Show Cause shall continue in effect until such time as the issues raised in the application for emergency relief are determined by the Court.

Furthermore, defendant Peter Voutsas has agreed not to contest the SEC's application for emergency relief with respect to him, and the SEC will shortly submit a proposed Order memorializing that agreement for the Court's review. The SEC has agreed that Mr. Voutsas can provide an accounting by or before October 7, 2014.

Respectfully submitted,

Howard A. Fischer Senior Trial Counsel

cc: All parties